

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability Litigation	MDL NO. 2:15-md-02641-PHX-DGC  <b>STIPULATION OF DISMISSAL WITHOUT PREJUDICE</b>
This document relates to the cases listed on the Exhibit attached hereto.	

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Plaintiffs whose cases are listed on Exhibit A attached hereto (“Plaintiffs”) and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. (“Defendants”), and file this Stipulation of Dismissal without Prejudice, and in support thereof, respectfully show the Court as follows:

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and Defendants hereby stipulate to the dismissal of the cases listed on Exhibit A without prejudice to the re-filing of same. Plaintiffs and Defendants further stipulate that they are to bear their own costs.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby respectfully request that the Court dismiss the cases listed on Exhibit A in their entirety without prejudice to the re-filing of same and order that these parties are to bear their own costs.

Respectfully Submitted,

s/ Donald Hamilton Kidd

Donald Hamilton Kidd

dkidd@perdueandkidd.com

PERDUE & KIDD

510 Bering Dr., Ste. 550

Houston, TX 77057

P: 713.520.2500

F: 713.520.2525

**ATTORNEY FOR PLAINTIFFS**

s/ Richard B. North, Jr.

Richard B. North, Jr.

richard.north@nelsonmullins.com

NELSON MULLINS RILEY &

SCARBOROUGH LLP

201 17<sup>th</sup> St. NW, Ste. 1700

Atlanta, GA 30363

P: 404.322.6000

F: 404.332.6397

**ATTORNEY FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that on December 2, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

s/ Donald Hamilton Kidd

Donald Hamilton Kidd

## EXHIBIT "A"

<b>Member Case Number</b>	<b>Full Name of Plaintiff</b>	<b>Date Answer Filed (If applicable)</b>
2:16-cv-02684-DGC	Sharon Garcia	8/16/2016
2:19-cv-01957-DGC	Marquitta Haines	4/9/2019
2:19-cv-01958-DGC	Kevin Hall	4/9/2019
2:19-cv-00026-DGC	James Hollway	1/15/2019
2:19-cv-01959-DGC	Cynthia Kinnamon	4/9/2019
2:16-cv-04147-DGC	James Lewis	12/6/2016
2:16-cv-01625-DGC	Cally Lutz	6/7/2016
2:19-cv-01963-DGC	Tyrone Mortise	4/10/2019
2:19-cv-01964-DGC	VaRawn Pinckney	4/9/2019
2:19-cv-01965-DGC	Joe Reed	4/9/2019
2:19-cv-01966	Carrie Stowell	4/10/2019